

REMARKS

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated April 27, 2006 has been received and its contents carefully reviewed.

Claims 1–15 are currently pending. No claims are amended; no claims are canceled and no claims are added. Reexamination and reconsideration of the pending claims are respectfully requested.

In the Office Action, claims 1-15 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 5,995,084 (to Chan et al.)(hereinafter “Chan”) in view of U.S. Patent No. 6,611,257 B1 (to Dotson et al.)(hereinafter “Dotson”).

The rejection of claims 1-9 is respectfully traversed and reconsideration is requested. Claims 1-9 are allowable over the cited references in that each of these claims recites a combination of elements including, for example, “a sensor for automatically detecting the interface integrated circuit connected to the computer system” and further in combination with Applicant’s other claimed limitations. None of the cited references, including Chan and Dotson, singly or in any combination, teaches or suggests at least this feature of the claimed invention.

The Office has failed to establish a *prima facie* case of obviousness and Applicant requests that the rejection of said claims 1-9 be withdrawn at least for the following reasons.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)(emphasis added). See MPEP §2142.

First, the Office alleges that an analog switch matrix is a sensor. Applicant remains unconvinced that the analog switch matrix is a sensor as claimed in at least claim 1. Second, the Office has not established any motivation to combine the references. The Office alleges that “this would provide the enhanced functionality of a touchpad computer interface, which would improve the versatility of a touch system that is not only capable of providing pen or mouse input, but also able to distinguish and effectively use different types of touch panels or touch screens that is being automatically detected.” (Office Action at page 5). The Office’s alleged motivation is not found in the Dotson reference but instead has been gleaned from Applicant’s own Specification. Thus, the Office has used impermissible hindsight to combine the references and to reject the claims. Applicant also notes that the column and lines cited by the Office as alleged motivation have nothing to do with the analog switch matrix but generally refer instead to the touch screen interface circuit. See, e.g., Col. 6, Lines 55-60. Accordingly, Applicant respectfully submits that claim 1, and claims 2-9 which depend either directly or indirectly from claim 1, are allowable over the cited references.

The rejection of claim 10 is respectfully traversed and reconsideration is requested. Claim 10 is allowable over the cited references in that claim 10 recites a combination of elements including, for example, “sensing an interface integrated circuit connected to a computer system among at least two interface integrated circuits” and further in combination with Applicant’s other claimed limitations. None of the cited references, including Chan and Dotson, singly or in any combination, teaches or suggests at least this feature of the claimed invention.

Applicant’s arguments regarding claims 1-9 apply equally to claim 10 and will not be repeated. Specifically, as discussed above with respect to claim 1, the cited references fail to teach “sensing,” and the Examiner’s contention that analog switch matrix can “sense” is unfounded. Accordingly, Applicant respectfully submits that claim 10 is allowable over the cited references.

The rejection of claims 11-15 is respectfully traversed and reconsideration is requested. Claims 11-15 are allowable over the cited references in that each of these claims recites a combination of elements including, for example, “automatically detecting the interface integrated circuit connected to a computer system; and converting the coordinate signal in accordance with

the interface integrated circuit detected at a sensor and transmitting the converted coordinate signal to the computer system” and further in combination with Applicant’s other claimed limitations. None of the cited references, including Chan and Dotson, singly or in any combination, teaches or suggests at least this feature of the claimed invention.

Applicant’s arguments with respect to claims 1-10 apply equally to claims 11-15 and will not be repeated. Accordingly, Applicant respectfully submits that claims 11-15 are allowable over the cited references.

Applicant believes the foregoing arguments place the application in condition for allowance and early, favorable action is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: July 26, 2006

Respectfully submitted,

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the interface integrated circuit detected at a sensor and transmitting the converted coordinate signal to the computer system” and further in combination with Applicant’s other claimed limitations. None of the cited references, including Chan and Dotson, singly or in any combination, teaches or suggests at least this feature of the claimed invention.

Applicant’s arguments with respect to claims 1-10 apply equally to claims 11-15 and will not be repeated. Accordingly, Applicant respectfully submits that claims 11-15 are allowable over the cited references.

Applicant believes the foregoing arguments place the application in condition for allowance and early, favorable action is respectfully solicited.

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